

Received & Inspected

JAN 23 2012

FCC Mail Room

Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
445 12th Street, SW
Washington, DC 20554

**Re: Petition for Exemption from Closed Captioning Requirements
CG Docket No. 06-181, CGB-CC-_____**

Introduction

World Changes Tabernacle is presently located at 1241 Alta Vista Drive in Muscogee County of Columbus, Georgia. World Changes Tabernacle was founded in 1991. World Changes Tabernacle is a non-denominational ministry with a positive message to the community for upward mobility and opportunity for betterment of life.

World Changes Tabernacle's broadcast is "The Word is On". The message of the broadcast is one that encourages, empowers, enlightens, and provoke it's viewers to achieve a positive lifestyle. The viewers are given daily messages of hope and faith for themselves through biblical teachings. "The Word is On" promotes individual changes necessary to be a productive and upright citizen of the community. The messages of this broadcast teach love, kindness, cohesive, neighborliness and other positive thoughts to have a family oriented community.

"The Word is On" airs six days a week (Tuesday through Sunday) at 5:30AM on WXTX Fox 54 each day. Each daily broadcast is for a 30 minutes slot. The show is produced and edited by church volunteers. The broadcast serves a community of more than 180,000 citizens.

Providing captioning for this program would result in significant difficulty or expense. Thus, for the reasons set forth below, World Changes Tabernacle hereby requests an

“economically burdensome” exemption from the closed captioning rules for The Word is On, pursuant to § 79.1(f) of the Commission’s rules.

Nature and Cost of Closed Captions

World Changes Tabernacle has sought several companies on their pricing for Close Captioning and have compared them with each other (see attached quotes). We have also sought assistance from our programming distributors and were informed that they are not in a position to assist us considering they have to outsource their programs as well (see attached email from programmer). We have solicited for funding for Close Captioning for our program but have not received any positive confirmed answers at this time.

Impact on the Operation of the Program Provider

“The Word is On” cost approximately Thirty Thousand dollars (\$30,000.00) a year to produce and air. Each show is an approximate cost of Ninety- Six dollars (\$96.00) per episode. The lowest quote we obtained for Close Captioning editing is Two Hundred Seventy dollars (\$270.00)The increase to our budget to include the least of our quotes for Close Captioning would be an increase of around 280%. The ability for World Changes Tabernacle to absorb the additional cost for Close Captioning would cripple our efforts. We are simply unable to take on such an astronomical cost. Without this exemption we would have to pull our broadcast from the air. Based on the positive responses we receive by way of phone calls, mail and website we know that our community would suffer a loss if we were to come off the air.

Financial Resources of the Program Provider

World Changes is tax exempt (see attached) under non-profit as a church (religious entity). We are a small congregation of about of about 120 persons. Our sole source of income is the freewill giving of tithes and offerings of the members and visitors of World Changes

Tabernacle. The bulk of our expenses are the employee's salaries, church mortgage and the broadcast of World Changes Tabernacle. We have inquired from our programming distributor assistance in Close Captioning and found their source of assistance of no relief, based on the pricing of their provider. We were verbally told that they do not have the in house capability at this time and that they outsource their own material. We were then forwarded information from their outsourcer with the cost of their services included.

Type of Operations of the Program Provider

World Changes Tabernacle is a non-denominational church with the sole purpose of bettering the community in which we operate in several ways to include feeding, clothing, training and delivering biblical principles to the community for opportunities of a better life. We are able to spread the positive message of our faith by way of scheduled services at our facility and by television through "The Word is On" broadcast. We are a non-profit organization with the best interest of our community in the forefront of our minds.

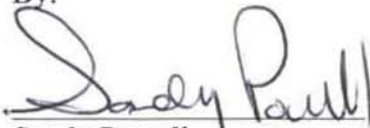
Conclusion

As shown by this Petition and its attachments, the Commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would be economically burdensome. The costs of captioning would be excessively high and would have a significant impact on Petitioner's operations, undermining its ability to provide the program. The Petitioner's type of operations and financial resources are different in kind and magnitude from a mainstream programming provider. Because of the significant difficulty and expense of providing closed captions, a waiver under § 79.1(f) is warranted. If more information is needed, please contact me at the address provided below.

Respectfully submitted,

World Changes Tabernacle

By:

A handwritten signature in cursive script, appearing to read "Sandy Powell", written over a horizontal line.

Sandy Powell
P. O. Box 5264
706-562-8070
706-563-7877.

Dated: 01/17/12

Exhibits checklist

1. Estimates, invoices, and other documents concerning the costs of captioning.
2. Exchanges with stations(s) about assisting with the cost of captioning; documentation of other efforts to seek sponsorship of the captioning costs.
3. Documentation concerning financial status. Include the most recent tax returns or balance sheets, tax exempt certificate, and documentation indicating the total cost of production of the program and gross receipts from the program. Redact social security numbers and employee identification numbers (the entire petition, including attachments, will be made available for public inspection). Confidential treatment of information contained in a petition may be requested (the request must be in writing), but keep in mind that the version of the petition made public must contain sufficient documentation to support the claim that closed captioning would be economically burdensome.
4. Schedule of all programming offered by the petitioner.
5. Affidavit. It should be in the following form (and provided on a separate page):

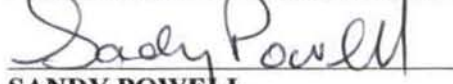
STATE OF GEORGIA)
MUSCOGEE COUNTY) ss.:

AFFIDAVIT OF SANDY POWELL


I, **SANDY POWELL**, being first duly sworn, depose and state:


1. I am the **ADMINISTRATOR** at **WORLD CHANGES TABERNACLE**, a church in **COLUMBUS, GEORGIA**. I am over the age of 21.
2. I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of **WORLD CHANGES TABERNACLE**, and, upon information and belief, believe the statements regarding our organization and the **WORD IS ON** to be true and accurate.

FURTHER AFFIANT SAYETH NOT.



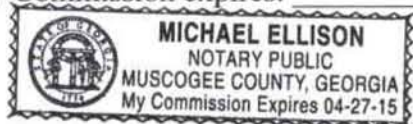
SANDY POWELL

SUBSCRIBED TO AND SWORN
before me this 17th day of January, 2012. 



Notary Public

My Commission expires: _____



phone: 800-688-6621
e-mail: info@abercap.com

Aberdeen Closed Captioning

Post-Production Captioning

- [Closed Captioning](#)
- [Spanish Captioning](#)
- [Transcription](#)
- [Webcasts](#)
- [DVD](#)
- [Dubbing and Distribution](#)
- [NLEdirect](#)

Live Captioning

- [TV Broadcasts](#)
- [Meetings and Seminars](#)
- [Webcasting](#)
- [Spanish Captioning](#)

Pricing Information

LIVE CAPTIONING:

Contract Services

\$75-\$100 (30 min. program)

\$100-\$160 per hour

Single-event Services

\$250 for the first hour, \$200 each additional hour

TAPE & NLEdirect POST-PRODUCTION CAPTIONING:

Pop-on Captioning

The program text pops onto the screen in blocks of one to three lines. The captions are carefully placed onto the screen so they do not interfere with on-screen text or graphics. Captions are

synched to the spoken word, moved around the screen to identify speakers and sound effects are described. Pop-on captions are the preferred viewing style of the hearing impaired.

\$7-\$16 per video minute (\$200 minimum)

Roll-up Captioning

Program text rolls onto the screen one line at a time. In most instances, a maximum of three lines are shown on the screen at a time. The captions are carefully synched to the spoken word and are placed onto the screen so they do not interfere with on-screen text or graphics. Roll-up captions are typically used for single speaker videos such as training or preaching programs.

\$5-\$13 per video minute (\$200 minimum)

All Pricing Includes:

- Verbatim transcription of your video. Deduct \$2 per video minute if verbatim transcript is provided.
- DVD approval copy (upon request)
- Volume discounts available
- 24 hour turnaround available

SUBTITLING, WEBCAST, DVD, FOREIGN LANGUAGE:

Call for pricing.

TRANSCRIPTION: (of any audio)

\$2-\$6/minute (\$50 minimum)

Aberdeen Captioning

22362 Gilberto, Suite 120
Rancho Santa Margarita, CA 92688
Phone: 800-688-6621
or 949-858-4463
Fax: 949-858-4405



Fw: captions for The Word is On

Wednesday, January 18, 2012 2:39 PM

From: "chandra anderson" <risenfromashes@bellsouth.net>

To: mellison7153@yahoo.com

----- Forwarded Message -----

From: Emily Bell <emily@captionmax.com>

To: "risenfromashes@bellsouth.net" <risenfromashes@bellsouth.net>

Sent: Fri, January 13, 2012 2:46:28 PM

Subject: captions for The Word is On

Hi, Sandy.

Thanks for looking into CaptionMax. For a series of half-hour programs, we can create [roll-up style](#) captions for **\$175** per episode. This includes professional human transcription, caption timing and formatting, PreciseCheck, and export of a caption data file. Standard-definition tape-to-tape encoding is **\$95** per episode. What format is your network asking for?

Shipping is additional, or we can use your shipping account number. Standard turnaround is about 4 business days, but we can give you a more specific turnaround estimate when we know more about your delivery schedule.

Please let me know if there are any questions I can answer for you or if there's anything else we can provide.

Thanks.
Emily

Emily Bell

Multimedia Manager

CaptionMax

direct: 612.656.1030

main: 612.341.3566



Fw: Home Show

Wednesday, January 18, 2012 2:41 PM

From: "chandra anderson" <risenfromashes@bellsouth.net>

To: mellison7153@yahoo.com

----- Forwarded Message -----

From: "O'Connor, Kim" <koconnor@wxtx.com>**To:** Sandy Powell <risenfromashes@bellsouth.net>**Sent:** Fri, January 13, 2012 3:21:04 PM**Subject:** FW: Home Show**From:** Scott, Michael**Sent:** Wednesday, November 02, 2011 1:27 PM**To:** Debby Brimberry**Cc:** O'Connor, Kim**Subject:** Re: Home Show

Ok thanks.

FYI... The Feds cracked down last week on religious programs that have waivers for Closed Captioning. They will eventually crack down on everyone, meaning the Home Shows will have to be Closed Captioned to air. Right now, we use company in the Carolinas to **Closed Caption at a cost of \$200-\$250 per 30 minutes** and it takes about a week to turn around. We are working on a better/cheaper/faster solution. All Church programs are going to have to be CC by the first of the year and between the 2 stations, we have lots.

Here a story on it:

<http://www.politico.com/news/stories/1011/67260.html>

Michael Scott | Marketing Producer | WTVM News Leader 9 | WXTX Fox54 | ☎ 706-494-5400 | ✉ mscott@wtvm.com

**From:** Debby Brimberry <info@forsalebyownerofcolumbus.com>**Date:** Wed, 2 Nov 2011 11:19:11 -0500

INVOICE



WXTX
6524 Buena Vista Road
Columbus, GA 31907
Main: (706) 494-5400
Billing: (706) 494-5400

Invoice #	Invoice Date	Invoice Month	Invoice Period
	12/25/11	December 2011	11/28/11 - 12/25/11
Station	Account Executive	Sales Office	Sales Region
WXTX		WXTX	Local

Billing Address:

World Changes
Attention: Accounts Payable
PO Box 5264
Columbus, GA 31906

Advertiser	Product	Estimate Number
World Changes	World Changes Paid Show	

Flight Dates	Order #	Alt Order #
12/28/10 - 12/25/11	503352	

Billing Calendar	Billing Type
Broadcast	Cash

Special Handling

Send Payment To:

WXTX
P.O. Box 11407
Lockbox #1051
Birmingham, AL 35246-1051

IDB #	Advertiser Code	Product Code

Agency Ref	Advertiser Ref

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type
1	12/28/10	12/23/11	PP T-F 530a-6a	530a-6a	-TWTF--	28:30	4	\$83.50	NM
Weeks: <u>Start Date</u> <u>End Date</u> <u>MTWTFSS</u> <u>Spots/Week</u> <u>Rate</u> 11/28/11 12/04/11 -TWTF-- 4 \$83.50									
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type 193 WXTX Tu 11/29/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d1A \$83.50 NM 194 WXTX W 11/30/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d2A \$83.50 NM 196 WXTX Th 12/01/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d3A \$83.50 NM 195 WXTX F 12/02/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d4A \$83.50 NM									
Weeks: <u>Start Date</u> <u>End Date</u> <u>MTWTFSS</u> <u>Spots/Week</u> <u>Rate</u> 12/05/11 12/11/11 -TWTF-- 4 \$83.50									
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type 199 WXTX Tu 12/06/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d1A \$83.50 NM 197 WXTX W 12/07/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d2A \$83.50 NM 198 WXTX Th 12/08/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d3A \$83.50 NM 200 WXTX F 12/09/11 5:29 AM PP T-F 530a-6a 530a-6a 28:30 wor1d4A \$83.50 NM									
Weeks: <u>Start Date</u> <u>End Date</u> <u>MTWTFSS</u> <u>Spots/Week</u> <u>Rate</u> 12/12/11 12/18/11 -TWTF-- 4 \$83.50									
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type 203 WXTX Tu 12/13/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d1A \$83.50 NM 202 WXTX W 12/14/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d2A \$83.50 NM 204 WXTX Th 12/15/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d3A \$83.50 NM 201 WXTX F 12/16/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d4A \$83.50 NM									
Weeks: <u>Start Date</u> <u>End Date</u> <u>MTWTFSS</u> <u>Spots/Week</u> <u>Rate</u> 12/19/11 12/25/11 -TWTF-- 4 \$83.50									
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type 205 WXTX Tu 12/20/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d1A \$83.50 NM 208 WXTX W 12/21/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d2A \$83.50 NM 207 WXTX Th 12/22/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d3A \$83.50 NM 206 WXTX F 12/23/11 5:30 AM PP T-F 530a-6a 530a-6a 28:30 wor1d4A \$83.50 NM									

We warrant that the actual broadcast information shown on this invoice was taken from the Program Log and will be available, on request, for inspection by the advertiser or agency for 12 months from the date of invoice. Our Terms, Where Credit Has Been Extended, are Net 30 Days From Date of Invoice.

This station does not discriminate in advertising contracts on the basis of race or ethnicity. Any provision in any order or agreement for advertising that purports to discriminate on the basis of race or ethnicity, even if handwritten, typed or otherwise made a part of a particular contract, is hereby rejected.

INVOICE

Send Payment To:



WXTX
P.O. Box 11407
Lockbox #1051
Birmingham, AL 35246-1051

Invoice #	Invoice Date	Invoice Month	Invoice Period
	12/25/11	December 2011	11/28/11 - 12/25/11
Advertiser	Product	Estimate Number	
World Changes	World Changes Paid Show		

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Spots/ Week	Rate	Type
2	01/01/11	12/25/11	PP Sa Su 530a-6a	530a-6a	-----SS	28:30	2	\$83.50	NM
Weeks: <u>Start Date</u> <u>End Date</u> <u>MTWTFSS</u> <u>Spots/Week</u> <u>Rate</u> 11/28/11 12/04/11 -----SS 2 \$83.50									
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type 98 WXTX Sa 12/03/11 5:30 AM PP Sa Su 530a-6a 530a-6a 28:30 wor1d5A \$83.50 NM 97 WXTX Su 12/04/11 5:30 AM PP Sa Su 530a-6a 530a-6a 28:30 wor1d6A \$83.50 NM									
Weeks: <u>Start Date</u> <u>End Date</u> <u>MTWTFSS</u> <u>Spots/Week</u> <u>Rate</u> 12/05/11 12/11/11 -----SS 2 \$83.50									
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type 99 WXTX Sa 12/10/11 5:30 AM PP Sa Su 530a-6a 530a-6a 28:30 wor1d5A \$83.50 NM 100 WXTX Su 12/11/11 5:30 AM PP Sa Su 530a-6a 530a-6a 28:30 wor1d6A \$83.50 NM									
Weeks: <u>Start Date</u> <u>End Date</u> <u>MTWTFSS</u> <u>Spots/Week</u> <u>Rate</u> 12/12/11 12/18/11 -----SS 2 \$83.50									
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type 101 WXTX Sa 12/17/11 5:30 AM PP Sa Su 530a-6a 530a-6a 28:30 wor1d5A \$83.50 NM 102 WXTX Su 12/18/11 5:31 AM PP Sa Su 530a-6a 530a-6a 28:30 wor1d6A \$83.50 NM									
Weeks: <u>Start Date</u> <u>End Date</u> <u>MTWTFSS</u> <u>Spots/Week</u> <u>Rate</u> 12/19/11 12/25/11 -----SS 2 \$83.50									
Spots: # Ch Day Air Date Air Time Description Start/End Time Length Ad-ID Rate Type 103 WXTX Sa 12/24/11 5:30 AM PP Sa Su 530a-6a 530a-6a 28:30 wor1d5A \$83.50 NM 104 WXTX Su 12/25/11 5:30 AM PP Sa Su 530a-6a 530a-6a 28:30 wor1d6A \$83.50 NM									

Total Spots 24 Net Total \$2,004.00

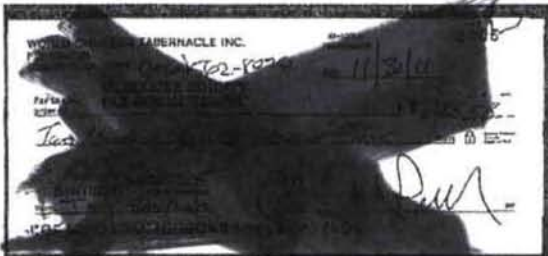
Payment Terms 30 Days

We warrant that the actual broadcast information shown on this invoice was taken from the Program Log and will be available, on request, for inspection by the advertiser or agency for 12 months from the date of invoice. Our Terms, Where Credit Has Been Extended, are Net 30 Days From Date of Invoice.

This station does not discriminate in advertising contracts on the basis of race or ethnicity. Any provision in any order or agreement for advertising that purports to discriminate on the basis of race or ethnicity, even if handwritten, typed or otherwise made a part of a particular contract, is hereby rejected.

SUNTRUST

Account
Statement



Ck # 2406 12/02 \$288.58



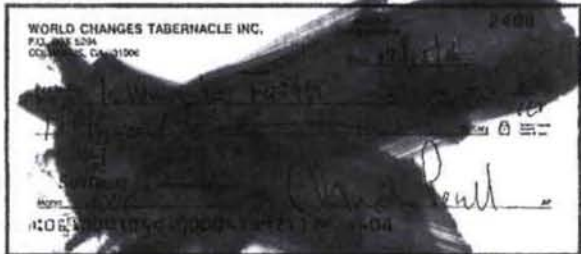
Ck # 2456 12/05 \$2,500.00



Ck # 2407 12/12 \$200.00



Ck # 2457 12/07 \$100.00



Ck # 2408 12/20 \$50.00



Ck # 2458 12/23 \$97.25



Ck # 2409 12/19 \$100.00



Ck # 2459 12/30 \$250.00



Ck # 2410 12/23 \$179.33



Ck # 2460 12/20 \$50.00

World Changes Tabernacle 2011 Income & Expense Report

Description	sub	Amount
		\$ -
Evangelism	\$ 4,910.00	\$ 4,910.00
Personal Ministries		\$ -
Education		\$ 8,053.00
	sun school	\$ 2,308.00
	staff traing	\$ 1,485.00
	Scholarship	\$ 4,260.00
Utilities		\$ 13,848.00
	Electric	
	Water	
Telephone		\$ 6,960.00
Internet		\$ -
Church Expenses		\$ 152,350.00
	Custodial Supplies	\$ 1,790.00
	Insurance	\$ 5,868.00
	Bank Service Charge	\$ 2,385.00
	building maintain.	\$ 9,175.00
	Potluck Supplies	\$ 4,982.00
	Postage	\$ 625.00
	outsourcprinting	\$ 2,760.00
	Office Supplies	\$ 2,461.00
	mortgage	\$ 38,580.00
	transportation/travel	\$ 15,984.00
	salaries	\$ 61,240.00
	Honorariums	\$ 6,500.00
Flowers & Gifts		\$ 1,480.00
Church/ Office Equip		\$ 2,250.00
Social Committee		\$ 1,150.00
	community events	\$ 400.00
		\$ -
		\$ -
		\$ -
		\$ -
		\$ -
Broadcast		\$ 29,667.00
	Airtime 54	\$ 26,052.00
	equipment	\$ 3,615.00
Total		\$ 220,668.00

Budget Committee:
INCOME FOR 2011

\$219,194.27